

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION, Plaintiff, v. BERNARD L. MADOFF INVESTMENT SECURITIES LLC, Defendant.
In re: BERNARD L. MADOFF, Debtor.
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, Plaintiff, v. BANK HAPOALIM B.M. and BANK HAPOALIM (SWITZERLAND) LTD., Defendants.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 12-01216 (CGM)

**STIPULATION AND AGREED ORDER EXTENDING
TIME FOR INITIAL DISCLOSURES**

WHEREAS, Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC (the “Trustee”) has brought Adversary Proceeding No. 12-01216 (CGM) (the “Action”) against defendants Bank Hapoalim B.M. and Bank Hapoalim (Switzerland) Ltd. (“Defendants”) (collectively with the Trustee, the “Parties”).

WHEREAS, on February 10, 2023, the Court entered a Case Management Plan in the Action (Dkt. No. 134) (the “CMP”).

WHEREAS, pursuant to the CMP, initial disclosures required under Federal Rule of Civil Procedure 26(a)(1)(A) must be served on or before 60 days after the date of entry of the CMP, which falls on April 11, 2023 (the “Initial Disclosure Deadline”).

WHEREAS, the Defendants requested, and the Trustee agreed to, a one-month extension of the Initial Disclosure Deadline.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the Parties, through their undersigned counsel, that:

1. The Initial Disclosure Deadline is extended up to and including May 11, 2023.
2. All other provisions of the CMP are unaffected by this order.

CONSENTED AND AGREED TO:

By: /s/ David J. Sheehan
Baker & Hostetler LLP
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
David J. Sheehan
dsheehan@bakerlaw.com
Keith R. Murphy
kmurphy@bakerlaw.com
Ferve E. Khan
fkhan@bakerlaw.com

By: /s/ Scott S. Balber
Herbert Smith Freehills LLP
450 Lexington Avenue
New York, New York 10017
Telephone: (917) 542-7600
Scott S. Balber
Jonathan C. Cross
scott.balber@hsf.com
jonathan.cross@hsf.com

*Attorneys for Irving H. Picard, Trustee for
the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff
Investment Securities LLC and the
Chapter 7 Estate of Bernard L. Madoff*

*Attorneys for Defendants Bank Hapoalim B.M.
and Bank Hapoalim (Switzerland) Ltd.*

Windels Marx Lane & Mittendorf, LLP
156 West 56th Street
New York, New York 10019
Telephone: (212) 237-1000
Facsimile: (212) 262-1215
Kim M. Longo
Email: klongo@windelsmarx.com

*Special Counsel for Irving H. Picard,
Trustee for the Substantively Consolidated
SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and the
Chapter 7 Estate of Bernard L. Madoff*

Dated: March 31, 2023
Poughkeepsie, New York



/s/ **Cecelia G. Morris**

Hon. Cecelia G. Morris
U.S. Bankruptcy Judge